

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
NORTHERN DIVISION

JANE DOE as Next Friend of
MINOR DOE, a Minor,

Plaintiff,

v.

Case No. 1:22-cv-11818
Hon. Thomas L. Ludington

DEBRA LEINER, JAMES BAILEY, and
D. BRUCE MARTIN, in their Official
and Individual capacities, and SAGINAW
TOWNSHIP COMMUNITY SCHOOLS,

Defendants.

THE MASTROMARCO FIRM
VICTOR J. MASTROMARCO, JR. (P34564)
KEVIN J. KELLY (P74546)
Attorneys for Plaintiff
1024 N. Michigan Avenue
Saginaw, Michigan 48602
(989) 752-1414
vmastromarco@mastromarcofirm.com
kkelly@mastromarcofirm.com

O'NEILL, WALLACE & DOYLE, P.C.
GREGORY W. MAIR (P67465)
KAILEN C. PIPER (P82865)
Attorneys for Defendants
300 St. Andrews Road, Suite 302
Saginaw, Michigan 48638
(989) 790-0960
gmair@owdpc.com
kpiiper@owdpc.com

PLAINTIFF'S MOTION TO FILE EXHIBIT UNDER SEAL IN
PLAINTIFF'S RESPONSE TO DEFENDANT'S MOTION TO COMPEL

NOW COMES the Plaintiff, JANE DOE, by and through her attorneys, THE
MASTROMARCO FIRM, and for her motion states more fully as follows:

1. Pursuant to Local Rule 7.1, concurrence was sought with regards to Plaintiff's request to have the identified documents filed under seal and concurrence was obtained.
2. That on February 16, 2023, Plaintiff filed her response to Defendants Motion to Compel. (See ECF #28).
3. That Plaintiff inadvertently included an exhibit in her response that contained interrogatory answers.
4. That the name of the Plaintiff and the next of friend is displayed in the interrogatory answers.
5. That there is an order granting Plaintiff's motion for a Protective Order and to Proceed Under a Pseudonym. (See ECF #11).
6. That Plaintiff is asking this Honorable Court to either place Exhibit #1 in ECF #28 under seal or to strike Plaintiff's entire response in ECF #28 and let Plaintiff refile the response with proper redactions.

WHEREFORE, the Plaintiff respectfully requests that this motion be granted.

Respectfully submitted,
THE MASTROMARCO FIRM

Dated: February 21, 2023

/s/ Rikki Mays-Reak
RIKKI MAYS-REAK (MN 0402751)
Attorneys for Plaintiff
1024 N. Michigan Ave.

Saginaw, MI 48602
(989) 752-1414
rmaysreak@mastromarcofirm.com

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Saginaw, Michigan 48602
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PLAINTIFF'S BRIEF IN SUPPORT

The Plaintiff hereby relies upon the authority and arguments presented in its Motion above. Further, Plaintiff relies upon the Federal Rules of Civil Procedure.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court issue an order granting Plaintiff's Motion and requested relief.

Respectfully submitted,
THE MASTROMARCO FIRM

Dated: February 21, 2023

/s/ Rikki Mays-Reak
RIKKI MAYS-REAK (MN 0402751)
Attorneys for Plaintiff
1024 N. Michigan Ave.
Saginaw, MI 48602
(989) 752-1414
rmaysreak@mastromarcofirm.com

CERTIFICATE OF SERVICE

I hereby certify that on **February 21, 2023**, I presented the foregoing papers to the Clerk of the Court for the filing and uploading to the CM/ECF system, which will send notification of such filing to the following: **Gregory W. Mair & Kailen C. Piper.**

THE MASTROMARCO FIRM

/s/ Rikki Mays-Reak

Attorney for Plaintiff